

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	
ALEXANDER E. JONES	§	Case No. 22-33553
	§	(Chapter 7)
Debtor.	§	

**STIPULATION AND AGREED ORDER EXTENDING THE  
DEADLINE FOR TRUSTEE TO OBJECT TO DEBTOR'S CLAIMED EXEMPTIONS**

**WHEREAS**, on December 2, 2022 ("**Petition Date**"), Alexander E. Jones ("**Debtor**") filed his voluntary petition for relief under chapter 11 of the Bankruptcy Code.

**WHEREAS**, on June 14, 2024 ("**Conversion Date**"), the Court entered an *Order* [DE 708] converting the bankruptcy from a chapter 11 proceeding to a chapter 7 proceeding and Christopher R. Murray was duly appointed as the chapter 7 trustee ("**Trustee**") over the Debtor's bankruptcy estate ("**Estate**").

**WHEREAS**, on June 28, 2024, the Debtor filed his *Schedules A/B, C, D, E/F, G, H, I, J, and Summary of Assets and Liabilities* [DE 749] ("**Conversion Schedules**") along with his *Statement of Financial Affairs* [DE 750].

**WHEREAS**, on July 2, 2024, the 341 meeting of creditors was held and concluded.

**WHEREAS**, the deadline for parties to object to the exemptions claimed by the Debtor in the Conversion Schedules was August 1, 2024 ("**Original Objection Deadline**").

**WHEREAS**, by *Stipulation and Agreed Order* [DE 791], the Original Objection Deadline was extended for all parties to September 2, 2024.

**WHEREAS**, by *Stipulation and Agreed Order* [DE 833], the Original Objection Deadline was further extended for all parties to September 30, 2024 [DE 833].

**WHEREAS**, by *Stipulation and Agreed Order* [DE 866], the Original Objection Deadline was further extended for the Trustee to November 29, 2024.

**WHEREAS**, the Trustee requested, and the Debtor agrees to a further extension of the Original Objection Deadline for the Trustee to respond to the Debtor's claimed exemptions ("**Trustee's Objection Deadline**").

**NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:**

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.
2. The Trustee's Objection Deadline is extended to January 13, 2025.
3. This *Stipulation and Agreed Order* does not affect the deadline applicable for parties, other than the Trustee, including any creditors and/or parties-in-interest in this bankruptcy case ("**Non-Trustee Parties**"), to object to the exemptions claimed by the Debtor in his Conversion Schedules. Those deadline(s) for Non-Trustee Parties remains the same unless otherwise agreed upon by a separate agreement by and between any of the Non-Trustee Parties and the Debtor, or by Court order.
4. Nothing herein shall be construed to prohibit the Trustee, any of the Non-Trustee Parties, or the Debtor from seeking further extensions by agreement and/or by further order of the Court.
5. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court's approval.
6. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

Dated: November 27, 2024

**IT IS SO ORDERED.**

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**Christopher M. Lopez**  
**United States Bankruptcy Judge**

**AGREED AS TO FORM AND SUBSTANCE  
ON NOVEMBER 27, 2024:**

<b>JONES MURRAY LLP</b> <u>/s/ Jacqueline Q. Chiba</u> Jacqueline Q. Chiba Texas Bar No. 24116899 <a href="mailto:jackie@jonesmurray.com">jackie@jonesmurray.com</a> 602 Sawyer St., Suite 400 Houston, TX 77007 Tel. (832) 529-1999 <b>Co-COUNSEL FOR THE CHAPTER 7 TRUSTEE</b>	<b>JORDAN &amp; ORTIZ, P.C.</b> <u>/s/ Shelby A. Jordan (with permission)</u> Shelby A. Jordan Texas Bar No. 11016700 <a href="mailto:sjordan@jhwclaw.com">sjordan@jhwclaw.com</a> 500 North Shoreline Blvd., Suite 804 Corpus Christi, TX 78401 Tel. (361) 884-5678 <b>Co-COUNSEL FOR THE DEBTOR</b>
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